

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF INDIANA  
SOUTH BEND DIVISION**

KASTURI HALDAR,

Plaintiff,

v.

UNIVERSITY OF NOTRE DAME DU LAC,  
SANTIAGO SCHNELL, AND CINDY  
PARSEGHIAN,

Defendants.

Case No. 3:24-cv-00836-  
CCB-SJF

**AFFIDAVIT OF KASTURI HALDAR IN SUPPORT OF SUPPLEMENTAL  
MEMORANDUM IN SUPPORT OF HER MOTION FOR RECONSIDERATION**

I, Dr. Kasturi Haldar, do hereby depose and state as follows:

1. I am the Plaintiff in this case.
2. I filed my Motion for Reconsideration of the Court's order denying my Motion for Temporary Restraining Order and Preliminary Injunction on November 18, 2024.
3. On December 9, 2024, my former graduate student, [REDACTED], told me that Notre Dame had resumed breeding of the mice he was using for his Ph.D. research.
4. On or about February 27, 2025, I learned that at some point after December 9, 2024, Notre Dame had euthanized the entire F colony of mice.
5. On or about February 27, 2025, I learned that Notre Dame had allowed the CH colony to dwindle to two breeding pairs, whose female members were past optimal breeding age. On March 21, 2025 I learned that Notre Dame has agreed to try to re-start breeding on this colony.
6. Notre Dame has continued breeding of the P colony of mice, but at a much slower rate than [REDACTED] needs for his Ph.D. research. It is my understanding that in

November [REDACTED] told Notre Dame that he needed 300 mice by February to complete his experiments, but he had only received twenty-four mice by mid-March 2025. Without sufficient P colony mice [REDACTED] cannot complete the experiments we had planned for his dissertation and related publications.

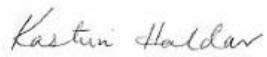
7. On March 21, 2025 I learned that Notre Dame has decided to euthanize all of the P and CH colony mice by June 30, 2025. Based on my knowledge of mouse breeding, and the rate at which Notre Dame has provided P colony mice to [REDACTED] thus far, I do not think it is possible that Notre Dame will be able to provide [REDACTED] 300 P mice and 48 CH mice by June 30, 2025.
8. If Notre Dame could provide [REDACTED] all the mice he needs by June 30, 2025, I expect he could complete all of his experiments around September 30, 2025, and submit a draft of his Ph.D. to his committee around January 30, 2026. Once the draft is submitted to the committee it usually takes approximately 4-5 weeks for the committee to review the draft, and for the student to revise the draft based on the committee's review.
9. Barring unforeseen complications, if [REDACTED] receives the mice he needs by June 30, 2025, I anticipate he could complete his dissertation by February 2026.
10. Because [REDACTED] research was begun in my laboratory and was under my direction and supervision until recently, I will be an author on any articles he publishes as a result of his research on NKH.
11. I was the editor in chief of PLOS Pathogens for eighteen years. I am knowledgeable about how journals work and the timelines on which they work.
12. Once a scientist is ready to submit a paper for potential publication, it can take 2-3 weeks to find a journal that is willing to send the paper out for review.

13. The journal then sends the paper out to 2-3 reviewer to get feedback. That process takes approximately 4-7 weeks.
14. Often the reviewers will propose additional experiments for the authors to conduct. Conducting those experiments can take 4-12 weeks.
15. After revised experiments are conducted, the updated manuscript is sent back to the journal, who sends it back to the same revieweres. If the reviewers find the updated manuscript acceptable, the journal accepts the paper. If the reviewers have further comments, the authors must address those in subsequent drafts of the manuscript.
16. [REDACTED] and I have a draft article that we plan to submit to the Journal of Clinical Investigation in mid-late April, titled *Astrocyte and neurogenic mechanisms of protective gene therapy prevent brain disease and death due to non-ketotic hyperglycinemia*. If everything goes smoothly, which is never guaranteed, I would expect that article to be accepted for publication by late September 2025.
17. This article is based on experiments with the P colony mice. [REDACTED] needs to add more data from new experiments to the draft we have in order to submit it.
18. [REDACTED] and I have a second article planned, based on experiments with the P and CH colony mice. This article is tentatively titled *Mutations in glycine decarboxylase remodel energy metabolism in the brain*.
19. To complete this article [REDACTED] will need all 300 P colony mice and 48 CH colony mice to conduct the necessary experiments.
20. If [REDACTED] is provided the mice he needs by June 30, 2025, I would expect he could conduct the necessary experiments and finish this manuscript by September 2025.

21. If we sent that manuscript to journals by October 2025, I would expect the manuscript could be accepted for publication around February 2026.
22. If Notre Dame euthanizes the mice on June 30, 2025, it is unlikely the manuscripts will be published, because [REDACTED] will be unable to complete experiments required by the journals' reviewers.
23. [REDACTED] thesis defense will likely need to be scheduled after these papers are accepted for publication, because he will need access to his lab and materials to complete the experiments suggested by reviewers for publication.
24. The publication of research is a key component of a professor's job, as set forth in Notre Dame's faculty contract.
25. My salary is in part dependent on the number of publications I have; if we cannot publish these studies due to Notre Dame's failure to provide promised resources it may impact my income.
26. In order to secure grants and donations, I have to demonstrate a strong publication record.
27. Peer-reviewed publications about these new therapies or ways to develop new treatments for disease are a required pre-requisite to my ability to license these ideas or products to a commercial partner.
28. I have filed one patent, and plan to file two additional invention disclosures based on the concepts that are explored in the studies [REDACTED] is conducting. The publications about these studies will be used by the patent examiners to determine whether to award the patents.

29. As an educator, the success of my trainees reflects on me. In order to attract strong trainees to work with me in the future, my past trainees have to excel in their careers—which they have up until now.

Signed under the pains and penalties of perjury this 24 day of March 2025.



---

Kasturi Haldar